

EXHIBIT A

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16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 IN RE SEAGATE TECHNOLOGY LLC
20 LITIGATION

No. 3:16-cv-00523-JCS

21 CONSOLIDATED ACTION
22
23

DECLARATION OF DUDLEY LANE
DORTCH IV REGARDING TRAVEL
RESTRICTIONS

1 I, DUDLEY LANE DORTCH IV, declare as follows:

2 1. I am Dudley Lane Dortch IV, a named plaintiff in the above-captioned case. I am
3 over 18 years old and make this declaration of my own personal knowledge and if called upon, I
4 would and could competently testify accurately thereto.

5 2. I reside in Goose Creek, South Carolina, which is located approximately 18 miles
6 northwest of Charleston, South Carolina.

7 3. I currently am the Information Technology and Security Manager at Coastal Kids
8 Dental & Braces ("Coastal Kids").

9 4. Coastal Kids is a dentist practice with approximately seventeen dentists and
10 orthodontists. It specializes in pediatric dentistry, orthodontics, and after-hours emergency dental
11 care. Coastal Kids maintains five locations in the Charleston area that are each open six days a
12 week. In addition, the company is presently establishing two new facilities as well, scheduled to be
13 completed in the fall of this year.

14 5. As Information Technology and Security Manager, I manage all security, including
15 HIPAA and physical, and IT operations for the entire company, among other duties. I am
16 responsible for these same areas in the two facilities being built, so from present until fall are
17 uniquely busy for me.

18 6. As part of the terms of my employment, I am required to be able to be on-call and
19 able to physically respond to any inquiries or demands within a strict one hour window. This
20 requirement is imposed six days a week, or any time Coastal Kids is open. This means I must
21 remain within a forty to 100 mile radius of Charleston.

22 7. Proximity and responsiveness is critical for my position because I could be called to
23 attend to different types of dental equipment failures, including equipment failure during surgical
24 procedures that involve patients under medical sedation.

25 8. Because the five Coastal Kids centers are open six days a week, I have only one day
26 per week where I am not on-call, or subject to this 100 mile restriction. I do not have two
27 consecutive days off, nor do I get a traditional weekend.

